

United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT WASHINGTON, DC 20240-0001

Memorandum

To: Nick Fraiche, Panel Chair

Lars Herbst, Gulf of Mexico Regional Director

Jarvis Abbott, Chief (Acting), Office of Offshore Regulatory Programs Michael Idziorek, Chief (Acting), Safety & Incident Investigations Division

From: Scott A. Angelle, Director

Subject: Review of Panel Report for Green Canyon Area Block 205

I have reviewed the Panel report Investigation of June 1, 2019 Fatality; Lease OCS-G 05911; Green Canyon Area Block 205-A Genesis Spar; Gulf of Mexico Region, Houma District.

The report presents findings and conclusions arising from a fatality which occurred while a slickline crew rigged-down equipment from one well and rigged-up equipment on a second well. I thank the Panel for its work, accept the report and am directing that follow-up actions be taken in response to the Panel findings.

The Panel's recommendations underscore the importance that the protection of the environment is a key aspect of responsible exploration, development and production of our natural resources. The recommendations also draw attention to the importance of continued collaboration between BSEE and Operators to develop effective subsea leak detection systems.

I direct the Office of Offshore Regulatory Programs (OORP), in collaboration with the Gulf of Mexico Regional staff, to:

- Consider issuing a Notice to Lessees (NTL) to ensure personnel are aware of the potential fall hazards surrounding well slot access points (e.g., hatches and hatch covers) and to clarify 250.154(b) to include guidance for well identification when the wellhead is not easily visible from the wellhead access location. The NTL clarification should include the requirement for lease holders to label well hatch covers and deck areas located on decks above the well slots. Therefore, ensuring labels are marked on the deck area and hatch cover clarifying hatch cover to hatch location.
- Research the use of hatch cover barriers and consider promulgating regulations that would require the installation of a physical barrier on well hatch covers that are capable of being opened by personnel without the assistance of a lifting device, located on a walking deck surfaces above the well slot, and are not associated with emergency life safety situations.

I request that timelines for the completion of the above items be provided to me in writing within two weeks. Please consult and coordinate with the panel members during this process.

Please contact me if you have any questions regarding these directives. I again thank the Panel for its effort in this investigation and report development.